

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL SAVARD,

Defendant.

CASE NO. **1:19CR-106**

JUDGE **J. BARRETT**

INFORMATION

18 U.S.C. § 666(a)(1)(B)

26 U.S.C. § 7206(1)

THE UNITED STATES ATTORNEY CHARGES:

1. At times relevant to this Indictment, the City of Cincinnati was a local government located in the Southern District of Ohio.
2. At times relevant to this Indictment, the Cincinnati Police Department ("CPD") was a law enforcement agency of the City of Cincinnati.
3. At times relevant to this Indictment, the defendant, **MICHAEL SAVARD**, was an agent of the City of Cincinnati, that is, he was employed as a Captain for the City of Cincinnati Police Department.
4. The City of Cincinnati and the Cincinnati Police Department received federal benefits in excess of \$10,000 during the period from on or about July 2018 to on or about June 2019.

COUNT ONE

(Bribery Concerning Programs Receiving Federal Funds)

5. Paragraphs 1 through 4 of the Information are incorporated here.
6. From on or about May 20, 2019 to on or about June 6, 2019, in the Southern District of Ohio, the defendant, **MICHAEL SAVARD**, being an agent of a local government that received federal benefits in excess of \$10,000 in the twelve-month period from June 2018 to July 2019, corruptly solicited and demanded for his own benefit, and accepted and

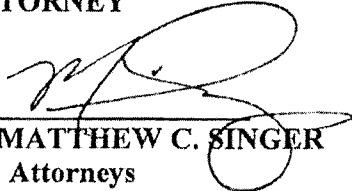
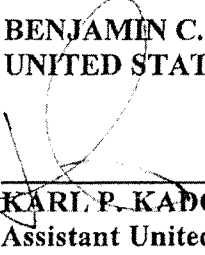
agreed to accept a thing of value from a person, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such local government involving a thing of value of \$5,000 and more, to wit, the defendant, **MICHAEL SAVARD**, solicited, accepted, and agreed to accept \$5,000 in cash from CPD Officer 1, an individual known to the grand jury, while intending to be influenced and rewarded in connection with the promotion of CPD Officer 1 from Sergeant to Lieutenant. **In violation of 18 U.S.C. § 666(a)(1)(B).**

COUNT TWO
(Filing a False Tax Return)

7. On or about October 17, 2016, in the Southern District of Ohio, the defendant, **MICHAEL SAVARD**, a resident of Hamilton County, Ohio, did willfully make and subscribe a U.S. Individual Income Tax Return (Form 1040) for tax year 2015, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. Specifically, the Form 1040, which was prepared and signed in the Southern District of Ohio and was filed with the Internal Revenue Service, was false as to a material matter, in that it underreported the defendant's total income by not including income earned by the defendant for working off-duty details at businesses.

In violation of 26 U.S.C. § 7206(1).

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY


KARL P. KADON III/MATTHEW C. SINGER
Assistant United States Attorneys